

Message

From: Keigwin, Richard [Keigwin.Richard@epa.gov]
Sent: 1/28/2017 3:04:17 PM
To: Phil Klein [pklein@cspa.org]
CC: Caulkins, Peter [Caulkins.Peter@epa.gov]; steven.goldberg@basf.com; Virginia Ruiz [vruiz@farmworkerjustice.org]; Wu, Mae [mwu@nrdc.org]; Schaible, Stephen [Schaible.Stephen@epa.gov]
Subject: Re: Suggested language

Thanks everyone. This looks fine.

Rick Keigwin
Deputy Director for Programs
Office of Pesticide Programs
U.S. Environmental Protection Agency

Sent from my iPhone

On Jan 27, 2017, at 12:01 PM, Phil Klein <pklein@cspa.org> wrote:

Rick
For your review from Steve and Virginia.
Phil

From: Virginia Ruiz [mailto:vruiz@farmworkerjustice.org]
Sent: Friday, January 27, 2017 11:50 AM
To: Steven J Goldberg <steven.goldberg@basf.com>; Phil Klein <pklein@cspa.org>
Cc: Wu, Mae <mwu@nrdc.org>
Subject: RE: Suggested language

Thanks Steve. I think that language will work well.

Virginia

From: Steven J Goldberg [mailto:steven.goldberg@basf.com]
Sent: Friday, January 27, 2017 7:55 AM
To: Phil Klein (pklein@cspa.org); Virginia Ruiz
Subject: Suggested language

Below is language that I think would be appropriate for the reporting section of PRIA (Section 33(k)). I think it would be a fairly easy add on to the bill, since it would only add an additional reporting section on to what is already being added.

Virginia, just to explain, the key point is in (iii) below. I have crafted that in a way that directs the agency to describe how they are engaging with worker groups. I have written it in a way that worker engagement is not just in the matter of how funds are expended, but evaluation of the appropriateness and effectiveness of the programs.

Happy to answer any questions about my thinking.

Steve

On page 19 of the discussion draft, in the provision that adds new sections for the PRIA annual report, as called for in 33(k), we would add an additional section for inclusion as new section "O"

"(O) With respect to Pesticide Registration Fund Set-Asides pursuant to Section (b)

- (i) The amount expended and nature of the program for which such funds were expended for, respectively, Worker Protection, Partnership Grants and Pesticide Safety Education;*
- (ii) An evaluation of the appropriateness and effectiveness of the programs for which such funds were expended; and*
- (iii) With respect to funds devoted to worker protection activities, how the agency has engaged stakeholders, particularly worker community-based organizations, in meeting the goals of Section 33(C)(3)(B)(i) and the evaluation under this section. "*

Steven J. Goldberg, Vice President & Deputy General Counsel, Regulatory & Government Affairs

Phone: 973-245-6057 Mobile: 201-602-9439 Fax: 973-307-2414 E-Mail: steven.goldberg@basf.com
Postal Address: 100 Park Avenue, Florham Park, NJ, 07932